1 THE HONORABLE BARBARA J. ROTHSTEIN 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 MIQUIYAH ZAMORA, AKA MIQUIYAH Case No. 2:23-cv-00154 BJR J. ZAMORA SIMMONS. 10 JOINT MOTION FOR ENTRY OF Plaintiff. STIPULATED PROTECTIVE ORDER 11 AND ORDER v. 12 NOTE ON MOTION CALENDAR: LOCK-N-LIFT, INC., a foreign (Nevada) June 28, 2023 13 Corporation, 14 Defendant. 15 16 I. STIPULATION AND MOTION 17 Counsel of record for Plaintiff Miquiyah Zamora and Defendant Lock-N-Lift, Inc. jointly stipulate and move pursuant to Local Civil Rule 7(d)(1) for entry of the proposed stipulated 18 19 protective order attached as Exhibit A and incorporated herein by reference. The parties further 20 also present, attached as Exhibit B, for the Court's consideration, pursuant to Local Civil Rule 21 26(c)(2) a redlined copy of the proposed stipulated protective order comparing the version 22 proposed by the parties with the Court's standard form order. 23 STIPULATED AND AGREED, THROUGH COUNSEL OF RECORD: 24 25 26 27 LANE POWELL PC JOINT MOTION FOR ENTRY OF STIPULATED

JOINT MOTION FOR ENTRY OF STIPULATEI PROTECTIVE ORDER AND ORDER - 1 Case No. 2:23-cv-00154 BJR

LANE POWELL PC 1420 FIFTH AVENUE, SUITE 4200 P.O. BOX 91302 SEATTLE, WASHINGTON 98111-9402 206.223.7000 FAX: 206.223.7107

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JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND ORDER - 2 Case No. 2:23-cv-00154 BJR

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1 II. ORDER THE COURT GRANTS the Stipulated Motion and APPROVES the entry of the Stipulated 2 Protective Order, attached as Exhibit A to the parties' stipulation and motion. 3 Dated: July 6, 2023. 4 Barbara & Rothstein 5 6 Barbara Jacobs Rothstein 7 U.S. District Court Judge Presented by: 8 DATED: June 28, 2023 9 LANE POWELL PC 10 By: *s/Daniel Miller* 11 Jeffrey M. Odom, WSBA No. 36168 Aaron Schaer, WSBA No. 52122 12 Daniel Miller, WSBA No. 56810 13 1420 Fifth Avenue, Suite 4200 P.O. Box 91302 14 Seattle, Washington 98111-9402 Telephone: 206.223.7000 15 odomj@lanepowell.com schaera@lanepowell.com 16 millerd@lanepowell.com 17 Attorneys for Defendant Lock-N-Lift, Inc. 18 DATED: June 28, 2023 19 McKEAN SMITH 20 21 s/Collin C. McKean Collin C. McKean, WSBA No. 42262 22 Joel F. Murray, WSBA No. 44786 355 West Columbia Way, Ste. 504 23 Vancouver, Washington 98660 Telephone: 360.502.7022 24 collin@mckeansmithlaw.com 25 joel@mckeansmithlaw.com Attorneys for Plaintiff Miquiyah Zamora 26 27

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND ORDER - 3 Case No. 2:23-cv-00154 BJR

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